

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CONNOR THOMPSON,

Plaintiff,

v.

MAGGIE LEE STEPHENS,

Defendant.

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Case No. 3:22-cv-00094

JOINT MOTION FOR ENTRY OF MUTUAL RESTRAINING ORDER

COME NOW the Parties, Plaintiff and Defendant, by and through the undersigned counsel, and hereby move the Court to enter a mutual restraining order restraining and enjoining both parties from coming around the other, communicating with the other directly or indirectly (except through counsel), or using third parties contact or communicate with the other. In support thereof, the Parties would show unto this Honorable Court as follows:

1. The Parties would show unto the Court that, on September 19, 2022, the Parties fully compromised and resolved the claims and issues between them in this matter.
2. On September 19, 2022, the Parties, through the undersigned counsel, filed an Agreed Order of Dismissal and Mutual Restraining Order, which seeks to dismiss this matter, with prejudice (Docket Entry No. 19).
3. On September 20, 2022, the Court entered an Order instructing the Parties to file an appropriately supported motion for the injunctive relief being sought (Docket Entry No. 21).

4. The Parties respectfully submit the instant motion and the accompanying Memorandum in Support of the instant motion to request the entry of a mutual restraining order permanently restraining and enjoining both parties from coming around the other, communicating with the other directly or indirectly (except through counsel), or using third parties to contact or communicate with the other. The Parties further request the entry of a mutual restraining order permanently restraining and enjoining the parties from communicating with the other or coming within one hundred (100) feet of the other in the event the Parties are in the same place at the same time.
5. The Parties respectfully request that the court grant the instant motion to prevent the issues and claims that have been resolved between the Parties from recurrence.
6. The Parties have agreed that a mutual restraining order would prevent both from any interaction with each other and would therefore protect both parties for the issues and claims that have been resolved.
7. The Parties would respectfully submit to this Honorable Court that, in light of the Parties having fully compromised and resolved the claims and issues between them in this matter and having agreed to the terms of a mutual restraining order, there is good cause to grant a mutual restraining order permanently restraining and enjoining both parties as requested herein.

WHEREFORE, PREMISES CONSIDERED, the Parties jointly request that this Honorable Court enter an Order:

1. GRANTING the Parties' Joint Motion for Entry of Mutual Restraining Order;

2. Permanently restraining and enjoining both parties from coming around the other, communicating with the other directly or indirectly (except through counsel), or using third parties to contact or communicate with the other;
3. Permanently restraining and enjoining both parties from communicating with the other or coming within one hundred (100) feet of the other in the event the Parties are in the same place at the same time;
4. Waiving the requirement for any bond; and
5. For any and all further, general, and/or specific relief to which the Parties may be entitled or that the Court may deem necessary or appropriate.

Respectfully submitted,

/s/ Andrew Goldstein

Andrew Goldstein, Esq., BPR # 037042

Paul E. Tennison, Esq., BPR # 036956

COLE LAW GROUP, P.C.

1648 Westgate Circle, Suite 301

Brentwood, TN 37027

Telephone: (615) 326-9059

Fax: (615) 942-5914

agoldstein@colelawgroup.com

ptennison@colelawgroup.com

Attorneys for Plaintiff

/s/ Nathan Colburn (w/ permission by BPR # 037042)

Nathan Colburn, Esq., BPR # 028488

RICHARDS & COLBURN LAW GROUP

801 Rep. John Lewis Way South, Ste. 201

Nashville, TN 37203

Telephone: (615) 255-1212

nc@rc-lawgroup.com

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing JOINT MOTION FOR ENTRY OF MUTUAL RESTRAINING ORDER was filed electronically and that a true and exact copy of the foregoing was sent via email, CM/ECF, or U.S. Mail, postage prepaid, to:

Nathan Colburn, Esq.
Richards & Colburn Law Group
801 Rep. John Lewis Way South, Ste. 201
Nashville, TN 37203

On this the 7th day of October, 2022.

/s/ Andrew Goldstein

ANDREW GOLDSTEIN